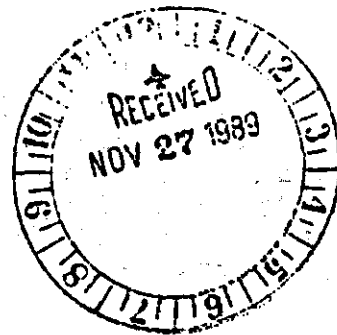


**SANDOZCHEMICALS**

**Sandoz Chemicals Corporation**  
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Charlotte, North Carolina 28205  
704.331.7088  
Fax: 704.377.1063

**William M. Archer, III**  
Director, Environmental Affairs



November 20, 1989

Acumenics Research & Technology, Inc.  
1025 Connecticut Avenue, NW  
Suite 900  
Washington, DC 20036

Attn: 104(e) Task

Re: Artel Chemical Corporation, 3HW12

Gentlemen:

In response to EPA's request for information pursuant to Section 104 of CERCLA and Section 3007 of RCRA for the Artel Chemical Site, Nitro, West Virginia, Sandoz Chemicals Corporation has searched and found the following information concerning dealings with the reference facility.

- 1) Prior to March, 1983, the Sandoz Chemicals Corporation, Mt. Holly Plant was owned by Martin Marietta Corporation as its Sodyeco Division. From the recollection of a former Sandoz employee, a one to two (1-2) liter sample of a byproduct material from the production of p-hydroxydiphenylamine was sent from Sodyeco Division to the subject facility, probably in the middle to latter 1970's to determine if it could be purified to a salable product. The desired product to be purified was 4-N- (4-hydroxyphenyl) aminodiphenylamine. No other material of this type other than the sample was believed shipped to the subject facility.

Purchasing records indicate that Sodyeco Division purchased two raw materials from Fike Chemical in the 1970's. Available information concerning these purchases is attached to this letter.

- 2) After purchase of the Sodyeco facility by Sandoz in 1983, the Mt. Holly facility is believed to have sent a one to two (1-2) liter sample of a recovered monomethylamine/water solution (~ 20% concentration) to the subject facility to determine if it could be further concentrated for reuse or resale. Although no records of the sample have been located, internal memos indicate that except for the sample, the material was not sent to the subject facility.



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Other than the information stated above, Sandoz Chemicals Corporation is unaware of any materials being shipped to the subject facility or any other transactions with the subject facility.

In reference to insurance policies covering releases of hazardous wastes or substances, Sandoz maintains insurance through Republic for sudden and non-sudden releases of hazardous wastes. These policies exclude coverage of costs related to CERCLA releases or cleanups. Copies of the applicable portions of these policies are enclosed.

Very truly yours,

*William M. Archer*

William M. Archer

WMA/jsh

Attachment

AR201313